

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ZOHREH STARR a/k/a ZOE STARR,

Plaintiff,

- against -

TIME WARNER INC. and TIME WARNER  
CABLE INC.,

Defendant(s).

CV 07-5871 (DC)

**NOTICE OF MOTION**  
**TO DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that upon the attached Declaration of Richard Reice, together with Exhibits A through G, and the accompanying Memorandum of Law in Support of Defendants' Fed. R. Civ. P. 12(b)(1) and 12(b)(6) Motion to Dismiss the Complaint, together with Tabs 1 through 16, and upon all the prior pleadings and proceedings herein, Defendants Time Warner, Inc. ("Time Warner") and Time Warner Cable, Inc. ("Time Warner Cable") will, at a date and time to be determined by this Court, before the Honorable Denny Chin, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Room 1020, New York, New York 10007-1312, move this Court for an Order (i) dismissing Plaintiff's Complaint in its entirety pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, for failure to state a cause of action; and (ii) granting such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
August 6, 2007

s/ Richard Reice  
Richard Reice (RR-8874)  
SEYFARTH SHAW LLP  
620 Eighth Avenue  
New York, New York 10018  
(212) 218-5500  
Attorneys for Defendants  
Time Warner, Inc. and Time Warner Cable, Inc.